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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12
13 **GGCC, LLC**, an Illinois Limited
14 Liability Company, Individually and on
15 Behalf of All Others Similarly Situated,
16

17 Plaintiffs,
18 v.
19

20 **DYNAMIC LEDGER SOLUTIONS,**
21 **INC.**, a Delaware Corporation, **TEZOS**
22 **STIFTUNG**, a Swiss Foundation,
23 **KATHLEEN BREITMAN**, an
24 Individual, and **ARTHUR BREITMAN**,
25 an Individual,

26 Defendants.

27 Case No: 3:17-cv-06779-RS

28 **DECLARATION OF JOSEPH J.**
DEPALMA IN SUPPORT OF GGCC
GROUP'S MOTION FOR
CONSOLIDATION, APPOINTMENT
OF LEAD PLAINTIFF AND
APPROVAL OF LEAD COUNSEL
SELECTION; MEMO OF POINTS
AND AUTHORITIES

29 Date: March 1, 2018

30 Time: 1:30 p.m.

31 Courtroom: 3, 17th Floor

32
33 **ANDREW OKUSKO**, individually and
34 on behalf of all others similarly situated,
35

36 Plaintiff,
37 v.
38 **DYNAMIC LEDGER SOLUTIONS,**
39 **INC.**, **THE TEZOS FOUNDATION**,
40 **KATHLEEN BREITMAN**, **ARTHUR**
41 **BREITMAN**, and **TIMOTHY**
42 **DRAPER**,

43 Defendants.

44 Case No: 3:17-cv-06829-RS

ANDREW BAKER, individually and on behalf of all others similarly situated,

Case No. 3:17-cv-06850-RS

Plaintiff,

V.

**DYNAMIC LEDGER SOLUTIONS,
INC., a Delaware corporation, TEZOS
STIFTUNG, a Swiss Foundation,
KATHLEEN BREITMAN, an
Individual, ARTHUR BREITMAN, an
Individual, JOHANN GEVERS, an
individual, STRANGE BREW
STRATEGIES, LLC, a California
limited liability company, and DOES 1
through 100 inclusive,**

Defendant.

BRUCE MACDONALD, Individually
and on Behalf of All Others Similarly
Situated.

Case No. 3:17-cv-07095-JSC

Plaintiff,

V.

DYNAMIC LEDGER SOLUTIONS, INC., a Delaware corporation, TEZOS STIFTUNG, a Swiss Foundation, KATHLEEN BREITMAN, an Individual, ARTHUR BREITMAN, an Individual, TIMOTHY COOK DRAPER, an individual, DRAPER ASSOCIATES, JOHANN GEVERS, DIEGO PONZ, GUIDO SCHMITZKRUMMACHER, BITCOIN SUISSE AG, NIKLAS NIKOLAJSEN, and DOES 1-100, INCLUSIVE.

Defendants

1 I, JOSEPH J. DePALMA, declare as follows:

2 1. I am an attorney licensed to practice and in good standing in the State of
3 New Jersey, and have been admitted *pro hac vice* to appear before this Court, Dkt.
4 No. 35. I am managing member of Lite DePalma Greenberg, LLC, proposed co-lead
5 counsel for GGCC, LLC, Pumaro LLC, and Nick Anthony (the “GGCC Group”) in
6 the above-captioned action. I make this declaration in support of the GGCC Group’s
7 Motion for Consolidation, Appointment of Lead Plaintiff and Approval of Lead
8 Counsel Selection. I have personal knowledge of the matters stated herein and, if
9 called upon, I could and would competently testify thereto.

10 2. Attached are true and correct copies of the following exhibits:

11 EXHIBIT A: Joseph J. DePalma’s Sworn Certification Pursuant to Civil
12 L.R. Rule 3-7(d)

13 EXHIBIT B: The Lite DePalma Greenberg, LLC firm resume

14 3. In the event the GGCC Group’s Motion is granted, my firm is prepared to
15 retain an attorney located in Switzerland to assist in the recovery of money and assets
16 owed or belonging to Class members. My firm has identified experienced Swiss
17 counsel with significant experience in asset recovery, I have had preliminary
18 discussions with that person concerning a retention for this matter, and have
19 confirmed that such retention would be clear of any conflicts.

20 4. In addition to expressing their intent to manage and control this litigation,
21 the GGCC Group has successfully negotiated a 20% cap on the amount of fees co-lead
22 counsel may seek in the event of any class-wide recovery.

23 I declare under penalty of perjury of the laws of the United States that the
24 foregoing is true and correct. Executed this 25th day of January, 2018.

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Joseph J. DePalma, Esq.

EXHIBIT 1



FIRM BIOGRAPHY

LITE DEPALMA GREENBERG, LLC

JANUARY 2018

Lite DePalma Greenberg, LLC is a general practice law firm, with three offices in Newark, Chicago and Philadelphia. The firm specializes in commercial and complex litigation with a concentration in class action matters in the areas of securities, antitrust, consumer fraud and insurance sales practices. More detail about the firm and its attorneys appear on its Web site, www.litedepalma.com.

MEMBERS OF THE FIRM

JOSEPH J. DEPALMA (Newark Office), the Firm's Managing Member, has a vast breadth of experience in many types of class action cases involving securities, ERISA, antitrust, product liability and consumer fraud. Mr. DePalma also handles shareholder derivative litigation, commercial litigation and transactional matters for the firm's corporate clients. He has a Masters Degree in Business Administration and a J.D. degree from Seton Hall University School of Law.

Mr. DePalma and LDG have served as Co-Lead Counsel for the State of New Jersey, Division of Investment, as Lead Plaintiff in two prominent class actions that have resulted in significant recoveries: *Reginald Newton v. Tenet Healthcare Corp.*, (Tenet Healthcare Securities Litigation), cv-02-8462-RSQL (C.D. Cal.) (\$281.5 million settlement); *In re Motorola Securities Litig.*, Civ. No. 03-C-287 (N.D. Ill.) (\$193 million settlement reached three business days before trial).



Mr. DePalma has also played an active role in obtaining settlements in numerous recognized class actions comprising some of the largest settlements in the nation. Included in such cases are: *In re Prudential Ins. Co. of America Sales Practices Litig.*, 148 F.3d 283 (3d Cir. 1998) (over \$4 billion paid out in largest insurance sales practices settlement ever) (Liaison Counsel); *In re Lucent Technologies Securities Litig.*, Civil Action No. 00cv621(AJL) (D.N.J.), reported opinions, 2003 WL 25488395 (D.N.J. Dec. 15 2003), 2002 WL 32815233 (D.N.J. July 16, 2002), 217 F. Supp. 2d 529 (D.N.J. 2002), 2002 WL 32818345 (D.N.J., May 9, 2002), 221 F. Supp. 2d 463 (D.N.J. 2001), 221 F. Supp. 2d 472 (D.N.J. 2001)(approximate \$610 million settlement)(Liaison Counsel); *Galanti v. Goodyear*, Civil Action No. 03-209(SRC)(D.N.J.)($\$300$ million product liability settlement)(Liaison Counsel); *In re Aremissoft Corp. Securities Litig.*, Civil Action No. 01-CV-2486 (JAP) (D.N.J.), reported opinion, 210 F.R.D. 109 (D.N.J. 2002)(over \$250 million recovered to date; case is ongoing)(Liaison Counsel); *In re Royal Dutch/Shell Transport Litigation*, Civil Action No. 04-1398(JWB)(D.N.J.), reported opinions, 404 F. Supp. 2d 605 (D.N.J. 2005), 380 F. Supp.2d 509 (D.N.J. 2005) ($\$90$ million ERISA settlement, the largest settlement ever under ERISA) (Liaison Counsel); *P. Schoenfeld Asset Management, LLC v. Cendant Corp.*, Civil Action No. 98-4734(WHW) ($\$26$ million settlement after precedent-setting decision in same case, *Semerenko v. Cendant Corp.*, 223 F.3d 165 (3d Cir. 2000))(Liaison Counsel); *Steiner v. MedQuist*, Civil Action No. 04-CV-05487-JBS (D.N.J.), reported opinion, 2006 WL 2827740 (D.N.J. Sept. 29, 2006) ($\$7.75$ million)(Liaison Counsel); *In re Tellium Securities Litig.*, No. 02-CV-5878 (FLW) (D.N.J.), reported opinion, 2005 WL 1677467 (D.N.J. June 30, 2005) ($\$5.5$ million)(Liaison Counsel), and; *In re NUI Securities Litig.*, Civil Action No. 02-CV-5220 (MLC)(D.N.J.), reported opinion, 314 F. Supp. 2d 388 (D.N.J. 2004) ($\$3.5$ million)(liaison counsel).



Mr. DePalma's years of experience also include the following major matters: *In re Computron Software, Inc. Securities Litig.*, Civil Action No. 96-1911 (AJL)(approximate \$15 million settlement) (Liaison Counsel); *In re USA Detergents, Inc. Securities Litigation*, Master File No. 97-2459 (MTB), District of New Jersey (\$10 million settlement)(Liaison Counsel); *In re: The Children's Place Securities Litig.*, Master File No. 97-5021 (JCL), District of New Jersey, reported opinion, 1998 WL 35167284 (D.N.J. Sept. 4, 1998) (\$1.7 million settlement) (Liaison Counsel); *Arthur Fields, et al. v. Biomatrix, Inc., et al.*, Civil Action No. 00-CV-3541(WGB), District of New Jersey (\$2.45 million settlement) (Liaison Counsel), and *In re Atlas Mining Securities Litig.*; Civil Action No. 07-428-N-EJL (D. Idaho) (\$1.25 million) (Lead Counsel).

Some of Mr. DePalma's other court approved class action and mass action settlements, all approved in 2010, involved product liability, takeover and ERISA matters. In a complex MDL mass action proceeding involving the illegal harvesting of body parts and the untested surgical implanting of those parts, Mr. DePalma, along with a team of nationally recognized colleagues, achieved a global settlement in a case captioned *In re Human Tissue Product Liability Litig.* (D.N.J.). Mr. DePalma achieved a settlement on behalf of shareholders in tender offer litigation, captioned *In re Alpharma Shareholder Litigation*, (N.J. Superior Ct.). In a complex ERISA matter involving two appeals to the Third Circuit, Mr. DePalma obtained a settlement of \$8.5 million on behalf of a class of participants in a retirement plan alleging breaches of fiduciary duties. *In re Schering-Plough Corporation ERISA Litigation*, (D.N.J.).

Mr. DePalma has also achieved excellent results for clients in other areas of litigation. Among other things, he won large settlements for a condominium association on construction defect and legal malpractice claims, and has successfully handled securities arbitrations as well.



Mr. DePalma has lectured in the area of real estate law and in complex commercial litigation. He has also served as a member of the New Jersey Supreme Court's District Ethics Committee.

Mr. DePalma was named as a New Jersey Super Lawyer in the May 2007, May 2008, May 2009, May 2010, May 2011, May 2012, and May 2013 issues of *New Jersey Monthly* magazine. He was also named to ALM's 2012 "New Jersey Top Rated Lawyers," listed under "Business & Commercial."

BRUCE D. GREENBERG (Newark Office) has served as Co-Lead Counsel and Liaison Counsel in major securities, antitrust and consumer fraud class action cases. He also handles sophisticated appellate, commercial and real estate litigation.

A number of Mr. Greenberg's class action cases have resulted in significant settlements. Among his federal court class action successes are a settlement worth more than \$750 million for a nationwide class in *Varacallo v. Massachusetts Mutual Life Ins. Co.*, 226 F.R.D. 207 (D.N.J. 2005) (Co-Lead Counsel), an insurance sales practices case, a \$35.75 million settlement in *In re STEC Securities Litig.*, No. SACV 09-01304-JVS (MLGx) (Co-Lead Counsel), a securities fraud case a nationwide consumer settlement worth up to \$13 million in *Schwartz v. Avis Rent a Car System, LLC*, Civil Action No. 11-4052(JLL), a highly valuable nationwide settlement in *In re Samsung DLP Television Class Action Litigation*, Civil Action No. 07-2141(GEB) (MCA) (Executive Committee), and settlements totaling over \$200 million for a nationwide class in the multidistrict antitrust litigation captioned *In re Insurance Brokerage Antitrust Litigation*, MDL No. 1663, Civil Action No. 04-5184(FSH) (District of New Jersey) (Liaison Counsel). His efforts as Co-Lead Counsel for certified classes in the United States District Court for the Western District of Pennsylvania (*Zeno v. Ford Motor Co.*, 238 F.R.D. 173 (W.D. Pa. 2006), and



480 F. Supp. 2d 825 (W.D. Pa. 2007)) and in the Superior Court of New Jersey, led to a four-state settlement that afforded full benefit of the bargain relief to consumers in *Pedersen v. Ford Motor Co.*, No. GIC 821797 (Cal. Super Ct.). Mr. Greenberg was also instrumental in *In re Motorola Securities Litig.*, Civ. No. 03-C-287 (N.D. Ill.), where LDG, as Co-Lead Counsel, achieved a \$193 million settlement just three business days before trial was to begin, and in *Reginald Newton v. Tenet Healthcare Corp.* (Tenet Healthcare Securities Litigation), cv-02-8462-RSWL (C.D. Cal.), where LDG, again as Co-Lead Counsel, won a settlement for \$281.5 million.

Recently, Mr. Greenberg was appointed Liaison Counsel and a member of the Plaintiffs' Steering Committee in a multi-district antitrust action alleging a nationwide conspiracy involving price-fixing and bid-rigging in the market for liquid aluminum sulfate, a water-treatment chemical used by public municipalities and paper mills in *In re: Liquid Aluminum Sulfate Antitrust Litigation*, MDL No. 2687, Civil Action No. 16-md-2687(JLL)(JAD) (District of New Jersey) (Liaison Counsel).

Mr. Greenberg's New Jersey state court class actions include a settlement valued at \$8.6 million for a nationwide class of current and former merchants in *Roma Pizzeria v. Harbortouch f/k/a United Bank Card*, Docket No. HNT-L-637-12 (Co-Lead Counsel); \$100 million settlement for a nationwide consumer class in *Friedman v. Samsung Electronics America, Inc.*, Docket No. BER-L-7250-01 (Liaison Counsel), a comparably sized settlement for a nationwide consumer class in *Summer v. Toshiba America Consumer Products, Inc.*, Docket No. BER-L-7248-01 (Liaison Counsel), another nationwide consumer class settlement in *Barrood v. IBM*, Docket No. MER-L-843-98, which afforded class members full benefit of the bargain relief, (Co-Lead Counsel), a settlement for a New Jersey consumer class worth over \$7 million in *Delaney v.*



Enterprise Rent-A-Car Co., Docket No. OCN-L-1160-01 (Co-Lead Counsel), a \$4.5 million settlement for a New Jersey consumer class in *DeLima v. Exxon*, Docket No. HUD-L-8969-96 (Co-Lead Counsel), and an unprecedented settlement in a class action involving a merger, *Rubin v. Mercer Insurance Group, Inc., et al.*, Docket No. MER-C-102-10 (Co-Liaison Counsel), which afforded stockholders the opportunity to review forward looking financial information of the company, thus allowing shareholders to make a more informed decision concerning the merger.

A 1982 graduate of the Columbia University School of Law, Mr. Greenberg clerked for Justice Daniel J. O'Hern of the Supreme Court of New Jersey for the 1982-83 Term. Before joining the firm, Mr. Greenberg was a partner at Greenbaum Rowe Smith & Davis, LLP, Woodbridge, New Jersey, one of New Jersey's largest law firms.

Mr. Greenberg appears regularly in the appellate courts. He has argued nine times in the Supreme Court of New Jersey, three cases in the Third Circuit Court of Appeals, and several dozen cases in New Jersey's Appellate Division. Nearly 40 of his cases have been published, including significant cases on class actions, zoning and land use, restrictive employment covenants, real estate brokerage, and other topics.

Among his many other publications, Mr. Greenberg is the author of the chapter entitled "Supreme Court Review" in *New Jersey Appellate Practice Handbook* (New Jersey ICLE 2015 ed.), co-author, with Allyn Z. Lite, of the chapter entitled "Class Action Litigation" in *New Jersey Federal Civil Procedure* (NJLJ Books (1st ed. 1999, 2d ed. 2010, and annual supplements)), and author of "Keeping the Flies Out of the Ointment: Restricting Objectors to Class Action Settlements," 84 St. John's L. Rev. 949 (2010). Law review articles that he has written have been cited with approval by the Supreme Court of New Jersey and Appellate

**LITE DEPALMA
GREENBERG**

Division. Mr. Greenberg has lectured on class actions for both New Jersey and Pennsylvania CLE, and has served as an expert witness on attorneys' fees in class actions. He has also spoken on civil trial preparation, appellate practice and other subjects. Mr. Greenberg also writes the New Jersey Appellate Law blog, <http://appellatelaw-nj.com>, New Jersey's foremost appellate blog.

Mr. Greenberg belongs to the New Jersey State Bar Association, and was Chair of the Association's Appellate Practice Committee from 2004-2006. He is the immediate past Co-Chair of the NJSBA's Class Actions Committee, a position he held from 2008-2016. Mr. Greenberg is also a member of the Land Use Law Section, and Securities Litigation and Regulatory Enforcement Committee. From 1991-2006, Mr. Greenberg was a member of the Supreme Court of New Jersey Committee on Character. He was also one of the founding members, and a past Chairman, of the New Jersey Law Firm Group, a consortium of major law firms to advance hiring of minority lawyers.

Mr. Greenberg has been named to the "New Jersey Super Lawyers" list in *New Jersey Monthly* magazine every year from 2005-2017. He was also named to ALM's 2012 "New Jersey Top Rated Lawyers," listed under "Commercial Litigation." Mr. Greenberg has an "AV" rating from Martindale-Hubbell.

VICTOR A. AFANADOR (Newark Office) handles litigation and trials of civil and criminal cases. His experience includes public entity tort liability defense, employment related defense of CEPA and LAD matters, police related state and federal civil rights defense, condemnation and redevelopment law, complex commercial litigation, and criminal defense. In addition, Mr. Afanador served from September 1999 through May of 2005 as Deputy Director of Law for the City of Perth Amboy. In that capacity, he provided counsel to the Mayor, the City



Council, and City department directors on legal matters.

Mr. Afanador has successfully tried to verdict jury and bench trials in civil rights and redevelopment law matters. He has also tried public entity employee termination hearings before the Office of Administrative Law and numerous matters of many types in Municipal Court. He also litigated and managed the condemnation of sixteen properties in a single municipality.

In addition to his trial work, Mr. Afanador has argued before the Superior Court of New Jersey, Appellate Division. His published opinions include *Deegan v. Perth Amboy Redevelopment Agency*, 374 N.J. Super. 80 (App. Div. 2005). Mr. Afanador has also applied his investigative skills in the class action area. He interviewed Spanish-speaking employees and prepared a report for the Court as part of the firm's responsibilities as Class Administrator for an employment discrimination class action.

Mr. Afanador clerked for Judges Mathias E. Rodriguez and Frederick P. DeVesa, Superior Court of New Jersey, Law Division Criminal Part, in Middlesex County from 1998-1999.

Mr. Afanador was appointed by the Essex County Executive in September of 2005 to serve as a Commissioner on the Essex County Board of Public Utilities. He is a member of the New Jersey State Bar Association, The Association of the Federal Bar of the State of New Jersey, Seton Hall University School of Law Alumni Association, the Essex County Bar Association, and the Hispanic Bar Association of New Jersey. He is a 2003 Graduate of the Leadership Newark Fellowship Program and has served on the African Globe Theatreworks Board of Directors, a professional theater company based in Newark, New Jersey.

Mr. Afanador was designated a Rising Star in the May 2006, May 2007, May 2008, May 2009, May 2010, May 2011, May 2012, and May 2013 issues of *New Jersey Monthly* magazine.



He was also named to the “40 Under 40” issue by the New Jersey Law Journal in 2010.

KATRINA CARROLL (Chicago Office), a Member of the Firm, heads LDG’s Chicago office. She has been actively involved in many of the firm's class actions since 2001 in the areas of consumer fraud, antitrust, securities fraud and ERISA. Early in her career, Ms. Carroll litigated some of the most prominent securities class actions in the country as Co-Lead counsel for defrauded investors, including *In re Motorola Securities Litigation* (N.D. Ill.), where LDG achieved a \$193 million settlement, and in *In re Tenet Healthcare Corp. Securities Litigation*, (C.D. Cal.), which resulted in collective settlements to aggrieved investors of \$281.5 million (including a \$65 million auditor settlement, one of the largest of all time).

In recent years, Ms. Carroll’s practice has been focused on large consumer fraud class action matters. One of these cases is *JP Morgan Chase Mortgage Modification Litigation* (D. Mass.), where she served on plaintiffs’ Executive Committee representing a class of homeowners in a multi-district class action alleging mortgage loan improprieties. After nearly four years of litigation, in May of 2014, plaintiffs secured final approval of a settlement estimated to provide \$500 million in mortgage modification relief to affected class members.

Ms. Carroll is particularly experienced in product liability matters. She serves as Co-Lead counsel in *In Re: Rust-Oleum Restore Marketing, Sales Practices and Products Liability Litigation* (MDL; N.D. Ill.), a sprawling products liability MDL relating to defective deck resurfacing products. Ms. Carroll was instrumental in negotiating a \$9.3 million settlement providing meaningful relief to consumers, which received final approval in March of 2017 and is currently being administered. During the final approval hearing, the Honorable Amy J. St. Eve of the United States District Court for the Northern District of Illinois, who presided over the litigation, praised Ms. Carroll as a “model I wish all lawyers would follow.”



Ms. Carroll is currently involved in some of the most challenging and exciting consumer, privacy and antitrust class action litigation in the country today. Her current caseload includes:

- *Mednick v. Precor Inc.* (N.D. Ill.): Ms. Carroll serves as Co-Lead counsel in a certified consumer fraud class action matter representing purchasers of Precor fitness machines, arising from Precor's representations concerning heart rate monitoring technology.
- *Keith v. Ferring Pharmaceuticals, Inc.* (N.D. Ill.): Ms. Carroll serves as Co-Lead counsel in a consumer class action on behalf of purchasers of the recalled fertility drug Bravelle.
- *Lewert v. P.F. Chang's China Bistro, Inc.* (N.D. Ill.): Ms. Carroll serves as Court-appointed Co-Lead counsel in a class action representing P.F. Chang's customers who had their personal financial information compromised as a result of a security breach.
- *In re Ashley Madison Customer Data Security Breach Litigation* (MDL; E.D. Mo.): Ms. Carroll currently serves on Plaintiffs' Executive Committee in the multi-district class action involving the highly publicized data breach at Ashley Madison.
- *In Re: Community Health Systems, Inc., Customer Security Data Breach Litigation* (MDL; N.D. Ala.): Ms. Carroll serves on the Plaintiffs' Steering Committee in this data breach MDL matter arising from Defendants' failure to secure Plaintiffs' confidential patient data.
- *Automotive Wire Harness Systems Antitrust Litigation* (MDL; D. Mich.): Ms. Carroll is plaintiff's counsel in this multi-district antitrust class action brought by businesses against manufacturers of automotive wire harnesses and related parts. Plaintiffs allege an illegal price fixing conspiracy by these manufacturers that artificially inflated the prices



of these products, in violation of the federal antitrust laws.

Ms. Carroll is recognized nationally as an authority on topics arising in class action litigation. She has spoken at many local and national conferences, including the American Bar Association's prestigious Annual National Institute on Class Actions (2014), Perrin's Class Action Litigation Conference (2015), the American Association for Justice's Convention (2016), and an Academic Symposium on consumer law issues hosted by Loyola University School of Law's Consumer Law Review (2017). Ms. Carroll frequently appears as a panelist on class action issues at the Chicago Bar Association.

Ms. Carroll currently serves on the Advisory Board of Loyola University School of Law's Institute for Consumer Antitrust Studies. She is a member of the Class Action Trial Lawyers Association, the Chicago Bar Association and a former member of New Jersey's John C. Lifland American Inn of Court.

SUSANA CRUZ HODGE (Newark Office), born Belleville, New Jersey, February 17, 1979. Admitted to bar, 2006, New Jersey. Education: Boston College (B.A. in Sociology 2001); Boston College Law School (J.D. 2005). Law Clerk to Hon. Thomas LaConte, Superior Court of New Jersey, Passaic County. Adjunct Professor of Legal Writing at Seton Hall University Law School. Class Actions; Civil Litigation; Commercial Litigation; Criminal Law; Public Entity and Administrative Law.

COUNSEL

ALLYN Z. LITE (Newark Office) (retired from the full-time active practice of law as of October 2013 and current serving as Counsel) specializes in class action and other complex commercial litigation. He was designated by the Judges of the United States District Court for the District of New Jersey as Clerk of that Court from 1982 to 1986. While in that position, Mr.



Lite created the Court's alternative dispute resolution program and served on and was Reporter for the committee that drafted the current Local Rules of the United States District Court for New Jersey. He was a member of the committee that drafted the new Rules of the United States Bankruptcy Court for the District of New Jersey, and participated as one of ten original members of the United States District Court Lawyer's Advisory Committee, on which he served for 11 years.

Mr. Lite is the author of *New Jersey Federal Practice Rules* (Gann Law Books), a commentary and annotations to the United States District Court's Local Rules, published annually, and cited frequently by the judges of that Court. Among his other publications is his co-authorship, with Bruce D. Greenberg, of the chapter entitled "Class Action Litigation" in *New Jersey Federal Civil Procedure* (NJLJ Books 1st ed. 1999, 2d ed. 2010, and annual supplements).

Mr. Lite has more than 20 years of class action litigation experience, including serving as an expert on attorneys' fees. He has served in an active role as Lead, Co-Lead, or Liaison Counsel in over 100 cases, including major securities, derivative, antitrust, consumer fraud, and products liability matters, in New Jersey federal and state courts and in other jurisdictions. In three of those cases, Mr. Lite and LDG were Co-Lead Counsel for the State of New Jersey, Division of Investment, as Lead Plaintiff: *Reginald Newton v. Tenet Healthcare Corp.*, (Tenet Healthcare Securities Litigation), cv-02-8462-RSWL (C.D. Cal.) (\$281.5 million settlement); *In re Motorola Securities Litig.*, Civ. No. 03-C-287 (N.D. Ill.), reported opinions, 505 F. Supp. 2d 501 (N.D. Ill. 2007), 2004 WL 2032769 (N.D. Ill. Sept. 9, 2004) (\$193 million settlement reached three business days before trial); *In re STEC Securities Litig.*, No. SACV 09-01304-JVS (MLGx) (\$35.75 million settlement); and *State of New Jersey and its Division of Investment v. Sprint Corp.*, Civil No. 03-2071-JWL (D. Kan.), reported opinions, 2008 WL 191780 (D. Kan.



Jan. 23, 2008), 2004 WL 1960130 (D. Kan. Sept. 3, 2004), 314 F. Supp. 2d 1119 (D. Kan. 2004).

Other significant class action cases in which Mr. Lite has played an active role include *In re Bristol-Myers Squibb Securities Litigation*, Civil Action No. 00-1190(SRC), reported opinions, 2005 WL 2007004 (D.N.J. Aug. 17, 2005), 205 F.R.D. 437 (D.N.J. 2002) (Liaison Counsel) (\$185 million settlement after defeating defendants' summary judgment motion and motions to exclude expert testimony); *In re Electrical Carbon Products Antitrust Litig.*, Master File No. 03-2182(JBS), reported opinion, 447 F. Supp. 2d 389 (D.N.J. 2006) (Co-Liaison Counsel) (\$21.9 million settlement); *In re Nazi Era Cases Against German Defendants Litigation*, Civil Action No. 98-4104(WGB), reported opinion, 198 F.R.D. 429 (D.N.J. 2000) (Liaison Counsel in 60 actions filed throughout the United States and consolidated in the District of New Jersey; \$5.2 billion settlement); *In re Prudential Insurance Company of America Sales Practices Litigation*, Master File No. 95-4704 (AMW), reported opinions, 962 F. Supp. 450 (D.N.J. 1997), *aff'd as to settlement approval*, 148 F.3d 283 (3d Cir. 1998) (Liaison Counsel) (settlement worth over \$4 billion); *Chin v. Chrysler Corp.*, Civil Action No. 95-5569 (JCL), reported opinion, 461 F. Supp. 2d 279 (D.N.J. 2006) (Co-Lead Counsel) (catalyst for \$53 million in relief to class); *Weiss v. Mercedes-Benz of North America*, Master File No. 93-96 (JWB), reported opinion, 899 F. Supp. 1297 (D.N.J.), *aff'd*, 66 F.3d 314 (3d Cir. 1995) (\$75 million settlement); *Princeton Economics Group, Inc. v. American Telephone and Telegraph Co.*, Docket No. L-3221-91, Superior Court of New Jersey, Law Division (Mercer County) (Lead Counsel) (\$95 million settlement); *Garcia v. General Motors*, Docket No. L-4394-95, Superior Court of New Jersey, Law Division, Bergen County (Liaison Counsel) (\$25 million settlement); *Angelino v. DaimlerChrysler Corp.*, Case No. GIC 765729, Superior Court of California, San Diego Division.



In other areas of his practice in complex litigation, Mr. Lite established and coordinated procedures for the nationwide defense of a major manufacturer of safety products in asbestos litigation, and handled the defense of environmental matters involving discharge of petrochemicals with Federal EPA and the U.S. Coast Guard. Mr. Lite has worked for many years alongside some of the nation's top intellectual property firms, serving as New Jersey counsel in major patent and trademark litigation, particularly in the pharmaceutical industry.

Mr. Lite served on the Lawyers' Advisory Committee for the United States Court of Appeals for the Third Circuit from 1992 through 1994, and as a member of the Third Circuit Task Force on Equal Treatment in the Courts, Gender Commission. He also chaired the United States District Court's Merit Selection Panel to recommend candidates for a newly authorized United States Magistrate position assigned to Newark, New Jersey. In addition to many years of service on the Board of Trustees of the Association of the Federal Bar of New Jersey, Mr. Lite was co-chair for four years of the New Jersey State Bar Association's Class Action Committee.

Mr. Lite was selected as a mediator for the United States District Court pursuant to that Court's plan under the Civil Justice Improvements Act of 1990. As a mediator, Mr. Lite participated in environmental litigation involving the nation's largest Superfund site, and a multi-plaintiff public sector discrimination lawsuit, among others.

Mr. Lite is a 1978 graduate of the Seton Hall University School of Law. He was named as a New Jersey Super Lawyer in the May 2005, May 2006, May 2007, May 2008, May 2009, May 2010, May 2011, May 2012, and May 2013 issues of *New Jersey Monthly* magazine. He was also named to ALM's 2012 "New Jersey Top Rated Lawyers," listed under "Intellectual Property."



STEVEN J. GREENFOGEL (Philadelphia Office) is Counsel to the firm and is resident in the firm's Philadelphia office. Throughout his nearly 40 year legal career, Mr. Greenfogel has specialized in class action antitrust litigation, including many of the most significant multidistrict class action price fixing cases of modern times. He has served as Co-Lead Counsel in *In re Chain Link Antitrust Litigation*, Master File CLF-1 (D.Md); *In re Industrial Silicon Antitrust Litigation*, 95-2104 (W.D.Pa) (which he tried to verdict), and *In re Isostatic Graphite Antitrust Litigation*, No. 2000-cv-4965 (E.D.Pa). Mr. Greenfogel also served as one of the main trial counsel as well as co-chairman in *In re High Pressure Laminates Antitrust Litigation*, No. 00-MD-1368(CLB) (S.D.N.Y.) (which was tried to verdict) and *In re Carbon Dioxide Antitrust Litigation*, MDL 940 (M.D. Fla) (which settled after jury selection). In addition to being Co-Chairman of Discovery in *In re Infant Formula Antitrust Litigation*, Master File No. MDL 878 (N.D. Fla), Mr. Greenfogel served as one of plaintiff's trial counsel (which settled after jury selection). He has served as a member of Plaintiffs' Executive Committee in numerous cases, including, *inter alia*, *In re Municipal Derivatives Antitrust Litigation*, MDL 1950 (S.D.N.Y. 2008), *In re Static Random Access Memory (SRAM) Antitrust Litigation*, cv-1819 (N.D. Cal 2007) and *In re Publication Paper Antitrust Litigation*, MDL 1631 (D. Ct 2004). Mr. Greenfogel has also played a major role in numerous other multidistrict antitrust class actions, including, *inter alia*, *O'Bannon v. National Collegiate Athletic Ass'n*, et al. cv-091967 cw (N.D. Cal 2009) (Co-chairman Discovery); *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL 1827 (N.D. Cal 2006); *In re Direct Random Access Memory (DRAM) Antitrust Litigation*, No. 02-cv-01486-OHG (N.D. Cal 2002); *In re NASDAQ Market Makers Antitrust Litigation*, MDL 1023 (S.D.N.Y.) (Chairman of Discovery); *In re Brand Names Prescription Drugs Antitrust Litigation*, MDL 997 (N.D. Ill.); *In re Commercial Tissue Antitrust Litigation*, MDL 1189 (N.D.



Fla); *In re Infant Formula Antitrust Litigation*, Master File No. MDL 878 (N.D. Fla); *Cumberland Farms v. Browning Ferris Industries, Inc.*, A.A. No. 87-3717; *Superior Beverage/Glass Container Antitrust Litigation*, 89 C 5251 (N.D. Ill.); *In re Chlorine and Caustic Soda Antitrust Litigation*, 86-5428 (E.D.Pa); *In re Records and Tapes Antitrust Litigation* (N.D.Ill.); and *In re Broiler Chicken Antitrust Litigation* (N.D.Ga).

Earlier in his career from 1977 to 1980, Mr. Greenfogel served as an Assistant Attorney General in the Commonwealth of Massachusetts and was the first Chief of its Antitrust Division. He was the author of the Commonwealth's Antitrust Law (M.G.L. 93). During that time, he was a panelist at the New England Antitrust Conference in Boston as well as speaking on antitrust matters at various venues in Massachusetts.

Mr. Greenfogel has served as a member of the Board of Trustees of Camden County College since 2000, having been appointed to that position by Governors Whitman, McGreevy and Corzine. He is a Fellow of the Litigation Counsel of America, as Trial Lawyer Honorary Society. He has been selected eight times as one of the Top Attorneys in Pennsylvania by *Philadelphia Magazine* and has an "AV" rating from Martindale Hubbell.

MINDEE J. REUBEN (Philadelphia Office) is Counsel to the firm and is resident in the firm's Philadelphia office. Ms. Reuben represents plaintiffs across the country in a broad range of antitrust and consumer class action matters, regularly serving as lead, co-lead and liaison counsel and as a member of case-management committees in high-profile, multi-jurisdictional litigation. *Super Lawyers* and *Philadelphia Magazine* have repeatedly named Ms. Reuben as one of Pennsylvania's top lawyers in the field of antitrust, as well as one of the top 50 women Super Lawyers overall in the state. Prior to this, Ms. Reuben was for several years named by *Super Lawyers* as a "Rising Star" in the field of antitrust litigation, an honor given to only 2.5% of



Pennsylvania lawyers under the age of 40.

Ms. Reuben is currently involved in several plaintiff class action antitrust matters, including *In re: Processed Eggs Products Antitrust Litigation*, No. 08-md-2002 (E.D. Pa.), in which she was named co-lead and liaison counsel. Other significant cases on which she is presently working and has a case management role include *In re: Lithium Ion Batteries Antitrust Litigation*, No. 13-md-2420 (N.D. Cal.) and *In re: Polyurethane Foam Antitrust Litigation*, MDL No. 2196 (N.D. Ohio), where the court has approved over \$147,000,000 in settlements.

Ms. Reuben's past antitrust matters include *BP Products North America, Inc. Antitrust Litigation* (N.D. Ill.) (\$52 million settlement), *In re: Polyester Staple Antitrust Litigation* (W.D.N.C.) (\$50 million settlement), *In re: Electrical Carbon Products Antitrust Litigation* (D.N.J.) (\$21 million settlement), *In re: Cotton Yarn Antitrust Litigation*, (M.D.N.C.) (\$7.8 million settlement), and *In re Sulfuric Acid Antitrust Litigation*, (N.D. Ill.) (\$7 million settlement).

Ms. Reuben also served as class counsel in the consumer class action of *Fritzinger v. Angie's List*, Case No. 12-cv-1118 (S.D. Ind.), and as co-lead counsel in *Stone v. Stewart Title Guaranty Co.*, Philadelphia Court of Common Pleas, June Term, 2006, No. 2003 (consol. under *Cummings v. Stewart Title Guaranty Co., et al.*, Philadelphia Court of Common Pleas, March Term, 2005, No. 747) (Glazer, J.), both of which resulted in favorable settlements for the class. At the final approval hearing, the court noted that "counsel really did an extraordinary job."

Ms. Reuben is actively involved with the Philadelphia Bar Association, having served as vice chair of the association's 2013 Bench Bar and Annual Meeting and as a past chair of its Women's Rights Committee. She is also a member of the Federal Courts Committee, Women in the Profession Committee and Business Law Section.



Ms. Reuben is a founding member of Women Antitrust Plaintiffs' Attorneys, a national organization of women who focus their practices on cartel and other anticompetitive cases. She is currently a Lecturer in Law in the area of legal writing for the LL.M. program at the University of Pennsylvania School of Law. She also has served as an Adjunct Professor of Law at the James E. Beasley School of Law of Temple University, contributed to numerous comprehensive legal publications, and spoken on a variety of subjects, including ethics and the Federal Rules of Civil Procedure.

After earning her joint law and master of public administration degrees from the University of Pittsburgh, Ms. Reuben served as a law clerk for the Honorable Frank J. Montemuro, Senior Justice of the Supreme Court of Pennsylvania.

STEVEN S. GLICKMAN (Newark Office) is Counsel to the Firm and is a resident in the Firm's Newark Office. Steven S. Glickman represents public and private sector employers throughout the State of New Jersey in a broad range of labor and employment, education and municipal law matters. Steven works with clients to ensure compliance with federal and state regulations, develop and implement union avoidance and labor relations strategies, negotiate and document individual employment contracts and collective bargaining agreements, and create and maintain effective employment policies and employee handbooks.

Steven is also an accomplished litigator, and has represented clients at trial, in settlement negotiations and in arbitration. He has successfully advised clients in a broad range of matters, including employment and labor disputes, and law enforcement investigations.

JEREMY N. NASH (Newark Office), born Oakland, California, February 2, 1981.

Admitted to bar of New York, 2008, United States District Courts for the Southern and Eastern Districts of New York, 2008, United States Court of Appeals for the Second Circuit, 2015.



Education: University of California at San Diego (B.S. in Biology 2003); New York Law School (J.D. 2006). Harlan Merit Scholarship recipient. Class Actions; Civil Litigation; Commercial Litigation; Appellate Practice.

ASSOCIATES

KYLE A. SHAMBERG (Chicago Office), born in Arlington Heights, Illinois, June 29, 1983. Admitted to bar of state of Illinois 2010; state of New York, U.S. District Courts for the Southern and Eastern Districts of New York, 2012; U.S. District Court for the Northern District of Illinois, Western District of New York, and U.S. Court of Appeals for the Second Circuit, 2013. Education: University of Wisconsin-Madison (B.A. in English and Psychology 2005); Loyola University Chicago School of Law (J.D. 2009, *magna cum laude*). Staff Attorney, U.S. Court of Appeals for the Second Circuit, 2009-2011. Class Actions; Civil Litigation; Commercial Litigation; Appellate Practice.

ANDREW L. SMITH (Newark Office), was born in Livingston, New Jersey on May 29, 1985. Admitted to the bar in 2011, New Jersey. Education: Muhlenberg College (B.A. in Accounting and Spanish 2008) and Pace University School of Law (J.D. 2011). Andrew's practice includes: public entity representation, criminal defense litigation, and commercial litigation.

ISMAEL T. SALAM (Chicago Office), born in Fort Worth, Texas, January 17, 1987. Admitted to bar of: State of Illinois, 2013; U.S. District Courts for the Northern District of Illinois, 2013; U.S. District Court for the Eastern District of Wisconsin, 2015; and U.S. District Court for the Eastern District of Michigan, 2016. Education: University of Texas-Arlington (B.A. in Political Science 2009, *summa cum laude*); Loyola University Chicago School of Law (J.D. 2013). Prior experience: Attorney, Siprut PC 2013-2016. Class Actions; Civil Litigation;



Commercial Litigation; Appellate Practice.

JONATHAN M. CARRILLO (Newark Office), was born in Jersey City, New Jersey on March 30, 1988. Admitted to the bar 2012, New Jersey. Education: Saint Peter's University (B.A. in Political Science and Philosophy 2009) and Rutgers School of Law (J.D. 2012). Jonathan's practice includes: public entity representation, employment litigation, criminal litigation, class actions and complex commercial litigation.

PHYLICIA A. PRESTON (Newark Office), was born in St. Croix, U.S Virgin Islands on March 20, 1988. Admitted to the bar 2015, New Jersey. Education: Seton Hall University (B.S. in Business Administration 2010) and Seton Hall University School of Law (J.D. 2015). Phylicia's practice includes: Public Entity Litigation; Criminal Litigation; Complex Commercial Litigation; Class Action Litigation; and Employment/Labor Law.

FRANCIS A. KENNY (Newark Office), was born in Manhattan, New York on August 28, 1987. Admitted to the bar 2015, New Jersey. Education: St. Joseph's University (B.A. in Political Science 2009) and Seton Hall University School of Law (J.D. 2015). Francis' practice includes: public entity representation, employment litigation, class actions and complex commercial litigation.

KATLYN C. MATHY (Chicago Office), was born in Lake Forest, Illinois on June 28, 1990. Admitted to the bar 2017, Illinois. Education: Illinois Wesleyan University (B.S. in Mathematics and B.A. in Risk Management 2012) and Loyola University Chicago School of Law (J.D. 2017). Katlyn's practice includes: insurance subrogation, personal injury, property, and class action litigation.

EXHIBIT 2

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

GGCC, LLC, an Illinois Limited
Liability Company, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

**DYNAMIC LEDGER SOLUTIONS,
INC.**, a Delaware Corporation, **TEZOS
STIFTUNG**, a Swiss Foundation,
KATHLEEN BREITMAN, an
Individual, and **ARTHUR BREITMAN**,
an Individual,

Defendants.

Case No: 3:17-cv-06779-RS

**CERTIFICATE OF JOSEPH J.
DEPALMA PURSUANT TO CIVIL
LOCAL RULE 3-7(d)**

Date: March 1, 2018

Time: 1:30 p.m.

Courtroom: 3, 17th Floor

ANDREW OKUSKO, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,
INC.**, **THE TEZOS FOUNDATION**,
KATHLEEN BREITMAN, **ARTHUR
BREITMAN**, and **TIMOTHY
DRAPER**,

Defendants.

Case No: 3:17-cv-06829-RS

ANDREW BAKER, individually and on behalf of all others similarly situated,

Case No. 3:17-cv-06850-RS

Plaintiff,

V.

**DYNAMIC LEDGER SOLUTIONS,
INC., a Delaware corporation, TEZOS
STIFTUNG, a Swiss Foundation,
KATHLEEN BREITMAN, an
Individual, ARTHUR BREITMAN, an
Individual, JOHANN GEVERS, an
individual, STRANGE BREW
STRATEGIES, LLC, a California
limited liability company, and DOES 1
through 100 inclusive,**

Defendant.

BRUCE MACDONALD, Individually
and on Behalf of All Others Similarly
Situated.

Case No. 3:17-cv-07095-JSC

Plaintiff.

V.

DYNAMIC LEDGER SOLUTIONS, INC., a Delaware corporation, **TEZOS STIFTUNG**, a Swiss Foundation, **KATHLEEN BREITMAN**, an Individual, **ARTHUR BREITMAN**, an Individual, **TIMOTHY COOK DRAPER**, an individual, **DRAPER ASSOCIATES**, **JOHANN GEVERS**, **DIEGO PONZ**, **GUIDO SCHMITZKRÜMMACHER**, **BITCOIN SUISSE AG**, **NIKLAS NIKOLAJSEN**, and **DOES 1-100, INCLUSIVE**.

Defendants

1 Pursuant to the United States District Court for the Northern District of
2 California Civil Local Rule 3-7(d), I, Joseph J. DePalma, declare as follows:

3 1. I am an attorney licensed to practice and in good standing in the State of
4 New Jersey, and have been admitted *pro hac vice* to appear before this Court, Dkt.
5 No. 35. I am managing member of Lite DePalma Greenberg, LLC, proposed co-lead
6 counsel for GGCC, LLC, Pumaro LLC, and Nick Anthony (the “GGCC Group”) in
7 the above-captioned action.

8 2. I do not directly own or otherwise have a beneficial interest in securities
9 that are the subject of this action.

10 I declare under penalty of perjury of the laws of the United States that the
11 foregoing is true and correct. Executed this 25th day of January, 2018.
12

13 
14 Joseph J. DePalma, Esq.